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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

SONOS, INC.,
Plaintiff and Counter-defendant,
v.
GOOGLE LLC,
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA
**DECLARATION OF CLEMENT
ROBERTS IN SUPPORT OF SONOS,
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL RE SONOS'S
MOTION IN LIMINE NO. 4**

1 I, Clement Roberts, declare as follows and would so testify under oath if called upon to do
 2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel
 4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good
 5 standing of the Bar of the State of California. I make this declaration based on my personal
 6 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set
 7 forth herein.

8 2. I make this declaration in support of Sonos’s Administrative Motion to File Under
 9 Seal in connection with Sonos’s Motion *in Limine* No. 4 (“Sonos’s Motion”) and Google’s
 10 Response to Motion *in Limine* No. 4 (“Google’s Response”).

11 3. Sonos seeks an order sealing the materials as listed below:

| DOCUMENT | PORTIONS TO BE SEALED | DESIGNATING PARTY |
|--------------------------------|-------------------------------|--------------------------|
| Google’s Response | Portions highlighted in green | Sonos and Google |
| Exhibit 8 to Judah Declaration | Entire document | Sonos and Google |

17 4. The portions of Google’s Response highlighted in green, and the exhibit listed
 18 above, contain references to Sonos’s confidential business information and trade secrets,
 19 including details of Sonos’s licensing negotiations with Google. The green-highlighted portion of
 20 Google’s response includes details from a confidential license negotiation document between
 21 Sonos and Google, and Exhibit 8 is that document. Disclosure of this information would harm
 22 Sonos’s competitive standing by giving Sonos’s competitors highly sensitive information about
 23 Sonos’s business dealings with other entities. A less restrictive alternative than sealing the
 24 portions of the Sonos’s Motion and the exhibits indicated in the table above would not be
 25 sufficient because the information sought to be sealed is Sonos’s confidential business
 26 information and trade secrets and is cited by Google.
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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my
2 knowledge. Executed this 25th day of April, 2023 in Belvedere, California.

3 /s/ *Clement S. Roberts*
4 Clement Seth Roberts

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